

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA,  
*ex rel.* TZAC, Inc.,

Plaintiff,

v.

23-CV-0483-JLS

MUSLIM PUBLIC AFFAIRS COUNCIL and  
MUSLIM PUBLIC AFFAIRS COUNCIL  
FOUNDATION,

Defendant.

---

**JOINT NOTICE OF DISMISSAL**

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), and in accordance with the terms and conditions of the settlement agreements entered into by and among the parties, the United States and Relator hereby notifies the Court that:

1. The United States and Relator have entered into a settlement agreement with and Defendants Muslim Public Affairs Council and Muslim Public Affairs Council Foundation (“Settlement Agreement”), attached hereto as Exhibit A;
2. Pursuant to paragraph 15 of the Settlement Agreement, the United States dismisses with prejudice its claims against Defendants for the Covered Conduct, as defined in Recital I of the Settlement Agreement;
3. Relator dismisses with prejudice all other claims Relator asserted against Defendants on behalf of the United States;

4. The United States consents to the dismissal of Relator's remaining claims on behalf of the United States against Defendants, provided such dismissal is without prejudice to the United States, based on the United States' determination that such a dismissal is commensurate with the public interest and that the matter does not warrant the continued expenditure of government resources to pursue or monitor the action based on currently available information;

5. Relator agrees that the amount and terms of the Settlement Agreement are fair, adequate, and reasonable pursuant to 31 U.S.C. § 3730(c)(2)(B); and

6. The Court shall retain jurisdiction to enforce the Settlement Agreement.

Respectfully submitted,

MICHAEL DIGIACOMO  
United States Attorney  
Western District of New York

s/ David M. Coriell

DAVID M. CORIELL  
Assistant U.S. Attorney  
138 Delaware Avenue  
Buffalo, NY 14202  
Tel: 716-843-5731  
David.Coriell@usdoj.gov

*Attorney for the United States*

s/ David Abrams

DAVID ABRAMS  
P.O. Box 3353 Church Street Station  
New York, New York 10008  
Tel: 212-897-5821

DATED: June 10, 2025

*Attorney for Relator*